

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

**In re UPSTREAM ADDICKS
AND BARKER (TEXAS) FLOOD-
CONTROL RESERVOIRS**

THIS DOCUMENT APPLIES TO:

**SOLTANI SAMAN; JACK MURCHISON
AND PATRICIA MURCHISON; KEENAN
HICKMAN AND LANA HICKMAN; AND
SHANETTE LANGS**

vs.

THE UNITED STATES OF AMERICA

Sub-Master Docket No.: 17-9001L

C.A. No. 1:18-cv-00343-SGB

AMENDED SHORT FORM COMPLAINT

Reference is made to the Master Amended Complaint for Upstream Plaintiffs (doc. 18) filed in the above-styled Sub-Master Docket on January 16, 2018 (“Master Complaint”). Plaintiff(s) incorporate by reference and adopt each allegation and cause of action, except any allegation pertaining to class allegations (including but not limited to paragraphs 92-104).¹

INFORMATION REGARDING PLAINTIFF(S)

Plaintiff(s) allege that, in and around Tropical Storm Harvey in August/September 2017 (“Harvey”), water impounded in Barker Reservoir (up to an elevation of 101.5 feet) and in Addicks Reservoir (up to an elevation of 109.1 feet), resulted in real property (the “Real Property”) and/or personal property (the “Personal Property”) belonging to Plaintiff(s) being flooded by the impounded water (collectively, the “Government Action”). The allegations are more fully set forth in the Master Complaint.

¹ At this time, Plaintiff(s) do not seek class treatment and do not opt into any class related to the Master Complaint. Unless and until presented with notice of class certification, at which time Plaintiff(s) will evaluate and determine whether to opt into such certified class, Plaintiff(s) take no position on class certification.

1. Name of Plaintiff(s): Soltani Saman; Jack Murchison and Patricia Murchison; Keenan Hickman and Lana Hickman; Shanette Langs.
2. The location by address of Plaintiff(s) Real Property subject to Plaintiff(s) allegations of a Fifth Amendment taking without just compensation, including the property's tax number:

Plaintiff Name	Address	Tax Number	Property Interest
Soltani Saman	15514 Tumbling Rapids Dr. Houston, TX 77084	1094590000004	Ownership
Keenan Hickman and Lana Hickman	6231 Presidio Canyon Dr. Katy, TX 77450	Fort Bend Property Tax No.: R224447 Account #: 2251-02-001-0290-914	Ownership
Jack Murchison and Patricia Murchison	19623 Knightsridge Ln Houston, TX 77094	1168000040022	Ownership
Shanette Langs	1911 Stone Meadows Ln Houston, TX 77094	1171320010018	Ownership

3. If Plaintiff(s) held Real Property at more than one location, please identify addresses and corresponding tax numbers for each location:

N/A

4. At the time of the Government Action, please state Plaintiff(s) property interest in each of the Real Property(s) listed in response to Questions 2 and 3 (e.g. Own, Rent, Leasehold, or other):

Own

5. The location by address of Plaintiff(s) Personal Property subject to Plaintiff(s) allegation of a Fifth Amendment Taking without just compensation is as follows:

Plaintiff Name	Address	Tax Number
Soltani Saman	15514 Tumbling Rapids Dr. Houston, TX 77084	1094590000004
Keenan Hickman and Lana Hickman	6231 Presidio Canyon Dr. Katy, TX 77450	Fort Bend Property Tax No.: R224447 Account #: 2251-02-001-0290-914
Jack Murchison and Patricia Murchison	19623 Knightsridge Ln Houston, TX 77094	1168000040022
Shanette Langs	1911 Stone Meadows Ln Houston, TX 77094	1171320010018

6. If Plaintiff(s) held Personal Property at more than one location, Plaintiff(s) identify the location of such other addresses as follows (please list all addresses):

N/A

7. Check all of the following boxes if Plaintiff(s) assert the same Causes of Action set forth in the Causes of Action section of the Master Complaint. If Plaintiff(s) elect to assert some, but not all, of the Causes of Action set forth in the Causes of Action section of the Master Complaint, check the boxes that Plaintiff(s) intend to assert below:

- ☒ Count I – Temporary Taking of a Flowage Easement without Just Compensation in Violation of the Fifth Amendment.
- ☒ Count II – Temporary Taking of Other Property Interests without Just Compensation in Violation of the Fifth Amendment.
- ☒ Count III – Permanent Taking of Damaged and Destroyed Property without Just Compensation in Violation of the Fifth Amendment.
- ☒ Count IV – Permanent Taking of a Flowage Easement without Just Compensation in Violation of the Fifth Amendment.

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